

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson; JAMISON J., by and through his next friend, Clara Lewis; DESIREE, RENEE, TYSON, and MONIQUE P., by and through their next friend, Sylvia Forster; JOHN A., by and through his next friend, James D. Johnson; CODY B., by and through his next friend, Sharon Scott; MARY, TOM, MATTHEW, and DANA W., by and through their next friend, Zelatra W.; AND SAM H., by and through his next friend, Yvette Bullock; on their own behalf and behalf of all others similarly situated,

Plaintiffs.

v.

CIVIL ACTION NO.
3:04-CV-251-TSL-FKB

PHIL BRYANT, as Governor of the State of Mississippi; DONALD TAYLOR, as Executive Director of the Department of Human Services; AND BILLY MANGOLD, as Director of the Division of Family and Children's Services,

Defendants.

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **David Barton**, of the Mississippi Department of Human Services, on September 17, 2019 at 9:00 a.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 1000, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A.

RESPECTFULLY SUBMITTED, this, 6th day of September, 2019.

s/Marcia Robinson Lowry
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PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)